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August 6, 2020

Hon. Carol Bagley Amon
U.S. District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jaswinder Kaur v. Rajendrasinh Jhala d/b/a
Nila's Eyebrow Center et al.
Case No. CV-20-1186(CBA)(VMS)

Dear Judge Amon:

This office represents the plaintiff in the above referenced action brought pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et. seq.* ("FLSA") and New York labor laws for alleged unpaid minimum wages, overtime and related wage violations. On July 30, 2020 defendants served responses to plaintiff's first discovery demands wherein Defendants disclosed for the first time that the business where plaintiff had worked was a corporation. Previously, because plaintiff was unaware that the business was incorporated, plaintiff brought the action against the two owners, only. However, plaintiff now requests permission to file the proposed First Amended Complaint so as to join Ajay International Corp. as an additional defendant. (Copy attached hereto as Exh.A). The only other amendment was to proposed paragraph 35 which adds alleged wages paid to plaintiff for dates that were omitted in error in the original complaint. Pat B. Pitchayan, Defendants' counsel, has advised me that he has no objection to this proposed amended pleading and that his office will accept service on behalf of the corporation.

Accordingly, plaintiff respectfully requests that the Court approve the filing of the First Amended Complaint and the parties jointly request that the time for all defendants to respond to the First Amended Complaint be twenty-one days from the date the First Amended Complaint is filed or deemed filed.

The parties thank you for your consideration of this request.

Very truly yours,

/S/

Arthur H. Forman

:AHF
Enc.